

Jessica A. Skelton, OSB #102714
jessica.skelton@pacificallawgroup.com
PACIFICA LAW GROUP LLP
1191 2nd Avenue, Suite 2000
Seattle, WA 98101-3404
206-245-1700

*Attorney for Intervenor-Defendant
Oregon Alliance for Gun Safety*

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PENDLETON DIVISION

OREGON FIREARMS FEDERATION,
INC., et al.,

Plaintiffs,

v.

TINA KOTEK, et al.,

Defendants,

and

OREGON ALLIANCE FOR GUN
SAFETY,

Intervenor-Defendant.

MARK FITZ, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

KATERINA B. EYRE, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants,

Case No. 2:22-cv-01815-IM (*Lead Case*)
Case No. 3:22-cv-01859-IM (*Trailing Case*)
Case No. 3:22-cv-01862-IM (*Trailing Case*)
Case No. 3:22-cv-01869-IM (*Trailing Case*)

CONSOLIDATED CASES

**INTERVENOR-DEFENDANT
OREGON ALLIANCE FOR GUN
SAFETY'S TRIAL EXHIBIT LIST**

and
OREGON ALLIANCE FOR GUN SAFETY,
Intervenor-Defendant.
DANIEL AZZOPARDI, et al.,
Plaintiffs,
v.
ELLEN F. ROSENBLUM, et al.,
Defendants.

INTERVENOR-DEFENDANT'S TRIAL EXHIBITS						
No.	Description	Stipulated	Objection(s)	Pre-Admit (Court Use Only)	Ident. (Court Use Only)	Admit. (Court Use Only)
701	Clayton E. Cramer, <i>Navy Yard Shooting Leaves Gun Control Crowd Out of Excuses</i> , Firearm News, Sept. 24, 2013 (Cramer Dep. Ex. 13)					
702	Clayton Cramer, <i>Gun Control and the Death of a Thousand Cuts</i> (Cramer Dep. Ex. 14)					
703	Clayton E. Cramer, <i>Ninth Circuit Victory: The End of the Beginning</i> , Firearm News, Feb. 14, 2014 (Cramer Dep. Ex. 15)					
704	Clayton Cramer, <i>A Victory in California</i> , Sept. 12, 2018 (Cramer Dep. Ex. 16)					
705	Clayton Cramer, <i>A Major Victory in California</i> , Apr. 2, 2019 (Cramer Dep. Ex. 17)					
706	Clayton Cramer, <i>An Unfavorable California Decision that May Later Bear Fruit</i> , Am.'s					

	First Freedom, Dec. 8, 2021 (Cramer Dep. Ex. 18)					
707	Clayton Cramer, <i>What is it Like to be a California Gun Owner?</i> , Am.'s First Freedom, Oct. 31, 2022 (Cramer Dep. Ex. 19)					
708	Clayton Cramer, <i>Why Oregon Ballot Measure 114 is Unconstitutional</i> , Am.'s First Freedom, Nov. 16, 2022 (Cramer Dep. Ex. 20)					
709	Open Secrets, Donor Lookup: Clayton Cramer (Cramer Dep. Ex. 21)					
710	Clayton Cramer, <i>Federal Judge Temporarily Blocks California's New Magazine Ban</i> , June 30, 2017 (Cramer Dep. Ex. 22)					
711	Clayton Cramer, <i>Does Limiting Magazine Capacity Matter?</i> , May 27, 2022 (Cramer Dep. Ex. 23)					
712	Clayton Cramer & Frank Miniter, <i>Can Biden Take Your Rights With the Stroke of a Pen?</i> , Am.'s First Freedom, Apr. 26, 2021 (Cramer Dep. Ex. 24)					
713	Clayton Cramer, <i>CRAMER: On the right side of the bullet</i> , Wash. Times, Feb. 9, 2012 (Cramer Dep. Ex. 25)					
714	Clayton Cramer & David Burnett, <i>Tough Targets</i> , Cato Inst. (2012) (Cramer Dep. Ex. 26)					
715	Mark Hanish Bio (Hanish Dep. Ex. 2)					
716	<i>FN Announces Release of California-Compliant Rifles</i> , Aug. 1, 2017 (Hanish Dep. Ex. 3)					
717	Dan Primack, <i>Following private equity's gun money</i> , Axios, Oct. 4, 2017 (Hanish Dep. Ex. 4)					
718	Yahoo Finance, AMMO, Inc. (POWW), https://finance.yahoo.com/quote/POWW/					

719	W.H. “Chip” Gross, <i>Ashley Hlebinsky: Historically Speaking</i> , NRA Women (Hlebinsky Dep. Ex. 31)					
720	Testimony of Ashley Hlebinsky, U.S. Senate, May 11, 2021 (Hlebinsky Dep. Ex. 32)					
721	Second Amendment Foundation, 2022 Gun Rights Policy Conference Speakers, https://www.saf.org/2022-gun-rights-policy-conference-speakers/					
722	The Gun Code LLC, https://theguncode.com/					
723	Gary Kleck, <i>Large-Capacity Magazines and the Casualty Counts in Mass Shootings: The Plausibility of Linkages</i> , 17 Justice Research & Pol’y pp. 28–47 (2016) (Kleck Dep. Ex. 43)					
724	Sarah Garrecht Gassen & Timothy Williams, <i>Before Attack, Parents of Gunman Tried to Address Son’s Strange Behavior</i> , Mar. 27, 2013 (Kleck Dep. Ex. 44)					
725	<i>Man who tackled shooter in Gabrielle Giffords attack dies</i> , CBS News, Mar. 12, 2016 (Kleck Dep. Ex. 45)					
726	Megan Gallegos, <i>Graphic Testimony at Colorado Gun-Control Trial</i> , Courthouse News Serv., Apr. 9, 2014 (Kleck Dep. Ex. 46)					
727	J. Pete Blair & Katherine W. Schweit, A Study of Active Shooter Incidents in the United States, 2000 – 2013 (2014) (Kleck Dep. Ex. 47)					
728	John J. Donahue, <i>Professor John Donahue: Facts Do Not Support Claim that Guns Make Us Safer</i> , Stanford L. Sch., Oct. 12, 2015 (Kleck Dep. Ex. 48)					
729	Michael Melia, <i>Mom: My son shouted for kids to flee Newtown gunman</i> , NBC News, Oct. 18, 2013 (Kleck Dep. Ex. 49)					

730	Report of the State's Attorney for the Judicial District of Danbury on the Shootings at Sandy Hook Elementary School and 36 Yogananda Street, Newtown, Connecticut on December 14, 2012 (Kleck Dep. Ex. 50)					
731	Robert A. Waters, <i>Guns Save Lives</i> (2002)					
732	Chris Bird, <i>Thank God I Had a Gun</i> (2d ed.2014)					
733	<i>Baltimore man pleads not guilty in Cross Keys robbery</i> , Wash. Examiner, May 10, 2006					
734	Gus G. Sentementes and Julie Bykowicz, <i>Documents detail Cross Keys shooting</i> , Baltimore Sun, Mar. 20, 2006					
735	<i>Jewelry store burglarized, scene of deadly 1994 robbery attempt</i> , WWBT NBC 12, Jan. 4, 2012					
736	Oxford Eng. Dictionary, "Magazine"					
737	Oxford Eng. Dictionary, "Accoutrements"					
738	Oxford Eng. Dictionary, "Cartridge box"					
739	William Dobein James, "A sketch of the life of Brig. Gen. Francis Marion and a history of his brigade" (1821).					
740	Journals of the Continental Congress (1774) (excerpt 1)					
741	Journals of the Continental Congress (1774) (excerpt 2)					
742	George Washington, General Orders (February 17, 1776)					
743	George Washington, Letter to John Hancock (October 10–11, 1777)					
744	William Duer, Congressional Resolution: A State of Facts, December 1777)					

745	Admiral W. H. Smyth and Vice-Admiral Sir E. Belcher, <i>The Sailor's Word-Book: An Alphabetical Digest of Nautical Terms</i> , London, 1867					
746	<i>Massachusetts Gazette</i> , May 19, 1775					
747	<i>State Gazette of South Carolina</i> , July 16, 1787					
748	<i>Evening Star</i> (Washington, D.C.), Jan. 9, 1868					
749	<i>Daily Morning Chronicle</i> (Washington, D.C.), Apr. 22, 1868					
750	<i>Daily Albany Argus</i> , Nov. 6, 1869					
751	<i>Daily Morning Chronicle</i> (Washington, D.C.), Feb. 3, 1872					
752	Acts and Laws March Session, Colony of Massachusetts Bay (1776)					
753	George Washington, General Orders (Jan. 22, 1780)					
754	George Washington, General Orders (May 1, 1783)					
755	<i>Incidents of the Insurrection in the Western Part of Pennsylvania, in the year 1774</i> (1795)					
756	<i>Derby Mercury</i> , March 19, 1756, p. 3					
757	<i>Jackson's Oxford Journal</i> , Mar. 20, 1756, p. 2					
758	<i>Pittsburgh Gazette</i> , Feb. 14, 1789, p. 1					
759	<i>N.Y. Journal</i> , July 23, 1790					
760	<i>Daily Morning Chronicle</i> , Washington, D.C., Jan. 7, 1868, p.4					
761	<i>Cedar Falls Gazette</i> , Jan. 10, 1868, p. 3					
762	<i>Gloucestershire Chronicle</i> , Jan. 4, 1868, p. 2.					
763	<i>The Jeffersonian</i> (Stroudsburg, Pa.), Jan. 9, 1868, p. 2.					

764	B. Kalesan, et al., <i>A multi-decade joinpoint analysis of firearm injury severity</i> , 3 Trauma Surgery & Acute Care Open 1 (2018)					
765	H.M. Bailey, et al., <i>Changes in patterns of mortality rates and years of life lost due to firearms in the United States, 1999 to 2016: A joinpoint analysis</i> , PLoS One 14(11) (Nov. 22, 2019)					
766	P.J. Brantingham, et al., <i>Assessment of Case Fatality Rates and Overall Prevalence of Firearm Violence in California, 2005-2019</i> , JAMA Netw Open (Jan. 28, 2022)					
767	City of Portland Police Bureau, Shooting Incident Statistics, https://www.portlandoregon.gov/police/81203					
768	B. Aarabi & H. Eisenberg, <i>Surgical Management and Prognosis of Penetrating Brain Injury</i> , Youmans and Winn Neurological Surgery (8th ed. 2023).					
769	<i>American Icon: The Blast Effect</i> , Wash. Post., Mar. 27, 2023					
770	Chana Sacks, et al., <i>Case 31-2018: A 37-Year-Old Man with a Self-Inflicted Gunshot Wound</i> , New England J. of Med., Oct. 1, 2018					
771	Dan Pronk, <i>A former special-operations doctor explains why he would rather be shot with an AK-47 than an M4</i> , Business Insider, Dec. 21, 2015					
772	Kirk Johnson & Serge F. Kovalski, <i>Series of Turning Points Limited Death Toll at Oregon Mall</i> , New York Times, Dec. 12, 2012					
773	Anna Griffin, <i>Clackamas Town Center shooting: 22 minutes of chaos and terror as gunman meanders through mall</i> , Oregonian, Dec. 15, 2012					

774	Clackamas Cnty., <i>Mall Shooting Clackamas Town Center</i> , https://bit.ly/3IbboVB					
775	Clackamas Cnty. Sheriff's Office, <i>Active-shooter investigation</i> , https://bit.ly/3MsuTf9					

DATED this 15th day of May, 2023.

PACIFICA LAW GROUP LLP

s/ Zachary J. Pekelis

Jessica A. Skelton, OSB #102714

Zachary J. Pekelis, *Pro Hac Vice*

Kai A. Smith, *Pro Hac Vice*


W. Scott Ferron, *Pro Hac Vice*

*Attorneys for Intervenor-Defendant
Oregon Alliance for Gun Safety*

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2023, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

DATED this 15th day of May, 2023.


Erica Knerr